

Letter For Electronic Distribution

Original signed letter on file at the following address:

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April 4, 2000

Mr. John Dirickson, P.E.
Environmental Engineer
Naval Air Station, Fallon
Public Works Department
Environmental Division-Code 187JD
4755 Pasture Rd.
Fallon, NV 89496

RE: NDEP Response to Site 9, Wastewater Treatment Plant
Draft Final Decision Document, August 27, 1999, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23 and 24
Remedial Investigation/Feasibility Study
Naval Air Station Fallon

Dear Mr. Dirickson:

Nevada Division of Environmental Protection (NDEP) staff has reviewed NAS Fallon's Report entitled *Decision Document, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24, Draft Final*, dated August 27, 1999. This report was prepared in response to a series of NDEP letters which commented on NAS Fallon's report entitled *Record of Decision, Sites 4, 5, 7, 8, 9, 10, 11, 15, 17, 18, 19, 23, 24, 25, 26, 27 Naval Air Station Fallon* (ROD), dated June 5, 1998. Due to significant changes between the Draft Final Decision Document and the Record of Decision, the referenced Draft Final Decision Document was reviewed as a draft document instead of a draft final. NDEP's comments on Site 9, Wastewater Treatment Plant, are addressed in this letter.

The level of detail and explanation presented in the Draft Final Decision Document does not appear to adequately explain the nature and extent of soil and groundwater contamination associated with Site 9. Based on NDEP's review of site conditions and supporting documentation to verify information provided in the Draft Final Decision Document, the NDEP remains concerned that significant data gaps remain. In particular, it appears that a contaminant source (leaking underground storage tank) identified during the Remedial Investigation/Feasibility Study (RI/FS) was not fully investigated. Total petroleum hydrocarbon (TPH) concentrations at the former location of the leaking underground storage tank (UST) exceeded the State action level of 100 mg/kg. The UST was located adjacent to a drainage canal where petroleum product was observed seeping from the

subsurface. Also, contamination was assumed to exist at the settling ponds. Groundwater samples were not collected at the former UST Site nor adjacent to the settling ponds. Two remote groundwater samples were collected south of Site 9. One sample was located approximately 250 feet south of the settling ponds and the second sample was located approximately 700 feet to the southeast. Due to the lack of site characterization data, Site 9 cannot be adequately evaluated.

This document needs to be available to the public for review, as appropriate, and an accurate record in the Decision Document is required so that an informed decision can be made. Accordingly, the Decision Document needs to be prepared so that the public can understand that contamination was assumed to exist at the settling ponds, and that the settling ponds were not closed in accordance with previously established guidelines. The public also needs to understand that the contaminant sources at Site 9 were not remediated or fully investigated during the RI/FS, and that risks to public health and the environment may not have been fully evaluated during the RI/FS due to incomplete investigations of the contaminant sources. Site 9 is located relatively close to the Lower Diagonal Drain where contamination of surface waters may occur, and an objective description of risks needs to be addressed in the Decision Document before the NDEP can concur with “No Further Action”.

Formal approval of a “No Further Action” Decision Document is based on the extent of the investigation and remediation, an understanding of the nature and extent of contamination, documentation in the administrative record, and post closure care which includes institutional controls, land use restrictions, and/or post-closure monitoring. The NDEP is concerned that contamination associated with Site 9 may be more extensive than presented in the Draft Final Decision Document. Furthermore, a program to remediate contaminated soil has not been implemented. Of considerable concern to the NDEP is that documentation to support the “No Further Action” recommendation in the Draft Final Decision Document does not appear to be included in the administrative record. In a letter dated January 20, 1999, the NDEP requested that supporting documentation (including logs for the eight borings, laboratory analytical reports, and the Sampling and Analysis Plan) be provided to the NDEP. However, this documentation has not been submitted to the NDEP. In consideration of these factors, the NDEP cannot concur with “No Further Action” at this time.

The NDEP will consider “No Further Action” for Site 9 after NAS Fallon either performs additional investigative work, or prepares an acceptable post-closure monitoring plan approved by the NDEP. Post closure care requirements and associated long-term costs will depend on the extent to which Site 9 is characterized. NDEP’s comments on the Draft Final Decision Document for Site 9 are attached to this letter. NAS Fallon must address these comments prior to NDEP approval of “No Further Action”. NAS Fallon has not responded to many of NDEP’s comments presented in the letter dated January 20, 1999. Comments in that letter which were not addressed in the Draft Final Decision Document are reiterated in the attached comments.

Since many of the issues regarding Site 9 have been on-going and unresolved for an extended period of time, please provide a time frame for addressing the comments in this letter within 30 days. If we as project managers cannot agree on a process to resolve these issues, the NDEP will need to initiate the dispute resolution process. If you have any questions, or need further clarification, please do not hesitate to contact me at (775) 687-4670, extension 3053.

Sincerely,

Jeffrey J. Johnson, P.E.
Geological Engineer
Bureau of Federal Facilities

JJ/js

cc:

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**COMMENTS ON THE DRAFT FINAL DECISION DOCUMENT
SITE 9, WASTEWATER TREATMENT PLANT**

1. Page 1, third paragraph: The Draft Final Decision Document states: *“The decision not to undertake a remedial action for this site is consistent with the factors set forth in the National Contingency Plan (NCP) 40 CFR part 300, and Nevada Administrative Code (NAC) Sections 445A.226 through 445A.22755. This decision was based on one or more of the following”* (three bulleted reasons follow).

The NDEP cannot concur with the above statement for the following reasons:

- C Supporting documentation appears to be missing from the administrative record. Therefore, NAS Fallon does not appear to be in full compliance with 40 CFR Part 300, Subpart I: Administrative Record for Selection of Response Action. See comments **6B**, **10** and **14**.
 - C An A-K analysis has not been submitted to the NDEP for approval in accordance with NAC 445A.226 through 445A.22755. Therefore, the statement presented after the first bullet on page 1 is not accurate and needs to be corrected. See Comment **3** below.
 - C Due to the unknown extent of TPH contamination associated with the underground storage tank, and the unknown extent of contamination below the settling ponds, it is possible that risks associated with Site 9 may not have been completely evaluated. Therefore, the statements after the first and third bullets on page 1 of the Draft Final Decision Document cannot be verified. See comment **9** below.
2. Page 1, last paragraph in Section I: The Draft Final Decision Document states: *“The Nevada Division of Environmental Protection (NDEP) has reviewed this document and concurred with this decision. There are not any nationally significant or precedent setting issues for this site.”*

The NDEP concurrence with “No Further Action” for this site in letters dated May 17, 1994, and August 21, 1997 was based on the assumption that reasonably supporting documentation would be formally presented in the Decision Document. However, numerous issues which are detailed in the comments in this letter have not been acceptably supported by documentation. Because supporting documentation has not been provided, the NDEP cannot sign off on a “No Further Action” Decision Document for Site 9 at this time. The NDEP will consider “No Further Action” action after these issues are resolved and supporting documentation is provided.

3. Page 2, Section A, last paragraph: *“The only soil contamination at site 9 was limited to a small area at the former UST pit and does not warrant further attention due to low human health risks. No significant groundwater contamination was detected”*.

The NDEP does not concur with the above statement. TPH concentrations in boring BH02

exceeded the State action level of 100 mg/kg. Although, TPH was not detected in borehole BH01, hydrocarbons were observed leaking into the drainage canal near the former diesel tank location (page 9-4 of the RI Report). Furthermore, groundwater samples were not collected to evaluate groundwater contamination. Therefore, the extent of contamination may be more extensive than presented in the Draft Final Decision Document. See comments **6B**, **7** and **9**.

4. Page 2, Section 1.2, Geology: The Draft Final Decision Document did not include site-specific geological information for Site 9. Page 9-7 of the RI Report provides a brief description of geologic conditions at Site 9 and states:

“The lithologies of these monitoring wells indicate beach and near-shore deposition. The majority of the sediments are poorly graded sands that range in size from fine to coarse grained in a generally fining downward sequence. Interbedded with these sands are minor silty sands and in the case of MW32, two moderately sorted sands at 4 ft and 13 ft that are 1 ft thick.....”

This is the type of information that should be included in the Decision Document to support the recommendations.

5. Page 6, Section F, last paragraph: The Draft Final Decision Document states *“The Draft Decision Document dated November 1995 for 6 sites including Site 9 was published on 31 January 1996 in the Lahontan Valley News and the Fallon Eagle Standard. These community participation activities fulfill the requirements of the CERCLA: Section 113(k)(2)(B)(I-v) and 117(a)(2). The Administration Record is available for review at the Churchill County Library.”*

The draft Decision Document dated November 1995 (received by NDEP January 23, 1996) was never completed by NAS Fallon, even after the NDEP provided comments in a letter dated March 5, 1996. Due to the elapsed time since the original draft Decision Document was published, NAS Fallon’s failure to respond to NDEP’s comments and complete the document, and the fact that the current document will contain different information, community participation during review and approval of the revised Draft Final Decision Document may need to be addressed again.

Based on Appendix A in the Draft Final Decision Document (Administrative Record), the documents listed below were not included in the administrative record. These documents should be listed because they contain data, factual information, and analyses that form the basis for the selection of the response action.

- C Logs for the eight borings.
- C Laboratory analytical reports.
- C Progress Reports that included data or interpretations for Site 9. This was previously requested in NDEP’s letter dated March 5, 1996.

- 6A. Page 6, Vadose Zone and Soil: The Draft Final Decision Document states *“Eight soil borings*

were drilled and sampled at "Site 9, the Wastewater Treatment Plant, as part of the Phase II investigation. Two additional borings were drilled and soil samples were collected during the installation of monitoring wells MW31 and MW32. Samples from these wells were collected at depths of 7 to 9 ft and 5 to 7 ft, respectively."

Only seven borings are presented in the figures and tables. Please include boring 8 in the figures and tables in the Decision Document. Additionally, sufficient information needs to be provided so that the depths of the soil samples can be compared to the depth of the water table in monitoring wells.

RI/FS activities at the settling ponds were intentionally limited, and the borings described above were not drilled to investigate contamination associated with the settling ponds. The Decision Documents needs to point out the original premise behind the limited investigation at the settling ponds so that the reader can put the scope of the investigation into perspective. The Preliminary Site Characterization Summary (PSCS) dated January 1992 states on page 116:

"Records indicating the type and amount of wastes disposed of at the sites were taken as verification that contamination existed at the sites. The approach taken to fulfill the data needs for the Group III Sites was to: (1) determine if the contaminants have reached the groundwater around the sites; (2) characterize the type, extent, and concentration of contaminants in the groundwater; and (3) determine if contaminants are migrating off site. It was assumed that some soil contamination existed within the landfill area and the settling ponds. However, characterizing the contents of a landfill or drilling in active settling ponds is an impractical undertaking, and the important issue at the site was whether or not contaminants were migrating from the site."

NAS Fallon has assumed that contamination is associated with the settling pond. The information presented above needs to be included in the Decision Document. Any post-closure recommendation needs to consider contamination associated with the settling ponds. See comment **12**.

6B. Page 7, Vadose Zone and Soil, first paragraph on page:

The Draft Final Decision Document states "Two of the soil borings, BH01 and BH02 were drilled near the location of the former diesel fuel UST. Soil samples for these two borings were taken continuously from the surface to the water table. BH02 contained 260 mg/kg of total petroleum hydrocarbons and some associated volatile compounds (ethylbenzene, xylenes) and SVOCs in the sample taken from 5 to 7 ft deep."

As stated in NDEP's letter dated January 20, 1999 for Site 9, and comment **3** above, TPH concentrations in soil have exceeded the State action level of 100 mg/kg. The RI Report states on page 9-4 that hydrocarbons were observed leaking into the drainage canal near the former diesel tank location. Although TPH was not detected in borehole BH01, the extent of contamination north of BH02 does not appear to have been investigated. It also appears that the potential for groundwater to be contaminated was not investigated. The Decision

Document needs to include this information and specify that potentially contaminated groundwater was not investigated. Please note that it is difficult to interpret conditions at this UST location from the drawings in the Draft Final Decision Document due to the scale.

The Draft Final Decision Document states “*None of the soil borings associated with the two grit disposal pits contained concentrations of metals higher than levels noted at **other sites***”.

This statement needs to be backed up with supporting data. Metal concentrations at Site 9 need to be compared to metal concentrations at **other sites** in a table. NDEP’s January 20, 1999 letter for Site 9 also requested that metal concentrations at Site 9 be compared to background metal concentrations and that a drawing showing the locations where the background samples were collected be provided. Metals are suspected contaminants at Site 9 and their concentrations in soil and groundwater above background concentrations need to be properly assessed. See comment **16**.

7. Page 7, Section B, Groundwater: The Draft Final Decision Document states “*Groundwater samples from the two monitoring wells at Site 9, were analyzed and indicated no significant contamination. See Table 2. Levels for all the samples from MW31 were reported as “no compounds detected”. Toluene was reported at a concentration of 2 ppb in MW32. Thus, there is no substantial groundwater contamination associated with the site.*”

Based on data collected to date, the NDEP does not concur with the above conclusion that “*no substantial groundwater contamination is associated with the site*”. Monitoring wells MW31 and MW32 are located approximately 250 feet south, and 700 feet southeast of Site 9, respectively. Only one groundwater sample was collected from each of these wells in April, 1991. Groundwater samples were not collected below the wastewater treatment plant settling ponds or at the former underground storage tank site located near a drainage canal. Analytical results for samples collected from MW31 and MW32 do not necessarily indicate that groundwater is not contaminated from Site 9 activities, especially when considering the distant well locations. Also, as discussed in **6A** above, contamination was assumed to exist below the settling ponds at Site 9. Therefore, closure of Site 9 must be based on demonstrating a lack of contaminant migration in accordance with NAC 445A.22745. One sample from two distant wells may not be sufficient to close Site 9. The Decision Document needs to address these concerns. See comment **12** regarding future work.

8. Page 7, Section B, Groundwater, last paragraph: The Draft Final Decision Document states “*Bail tests for MW31 and MW32 resulted in hydraulic conductivity of 0.2 and 0.6 ft/day respectively. Combining the groundwater gradient of 0.0017 ft across the sites and assuming a porosity of 33% results in calculated groundwater velocities of 0.5 and 1.1 ft/year respectively.*”

This statement originated from the draft Decision Document dated November 1995. The NDEP provided comments on this statement in a letter dated March 5, 1996 and states “*In enclosure 2 of Steve Iselin’s letter of January 16, 1996, a ground water velocity of 39 ft/yr, based on pump test data collected at Site 16, was estimated for the Site 9/MW32 area. Please*

use the most reliable estimate for ground water velocity at the site.” NDEP’s letter dated January 20, 1999 also requested that this issue be addressed in the Decision Document. The Decision Document needs to accurately present information regarding the hydraulic conductivity as described in NAS Fallon’s January 16, 1996 letter. The hydraulic conductivity at Site 9 is important information because the Lower Diagonal Drain is located approximately 350 feet to the south. The Draft Final Decision Document for Site 4 discusses hydraulic conductivities from both bail tests and aquifer tests, and the Decision Document for Site 9 needs to have the same discussion.

9. Page 8, Section C, Risk Assessment Summary: The Draft Final Decision Document states “*The HI for phytotoxicity at the former UST pit was just above the acceptable value, but the site is currently a gravel parking area. Plants do not grow in the area, which eliminates the phytotoxicity risk. (ASG 1994).*”

Due to the unknown extent of TPH contamination associated with the underground storage tank, and the unknown extent of contamination below the settling ponds, it is possible that risks associated with Site 9 may not have been completely evaluated. The Decision Document needs to address this issue. See comment **3, 6, and 7.**

10. Page 8, Section D, Conclusion: The Draft Final Decision Document states “*Soil contamination at Site 9 is limited to a small area at the former UST pit and no significant groundwater contamination was detected.*”

The NDEP does not concur with the conclusion. The extent of soil contamination does not appear to have been investigated and ground water samples adjacent to the potential sources have not been collected. See comments **3, 6 and 7.**

The Draft Final Decision Document also states that further action is not warranted and lists 6 reasons. The NDEP does not concur with these reasons. See comments **9, 3, 6, and 7** for reasons 1, 2 and 3. For reason number 4, see the comment regarding TDS concentrations in a separate letter that addresses comments common to all Draft Final Decision Documents.

Reason number 5 states “*the combination of low precipitation and high evapotranspiration is not conducive to contaminant migration*”. The Decision Document needs to explain how high evapotranspiration affects contaminant migration; supporting calculations must be presented to demonstrate this conclusion. It should be noted that significant contaminant migration has occurred at many sites throughout Nevada where low precipitation and high evapotranspiration exist. Therefore, the above reasoning to justify no further action may not be considered acceptable to the NDEP unless NAS Fallon can explain why their sites are different than other sites in Nevada.

Reason number 6 states “*diesel fuel is known to readily biodegrade*”. Intrinsic remediation is currently being evaluated at NAS Fallon. Biodegradation of diesel fuel cannot be used to justify “No Further Action” until the intrinsic remediation study is completed and biodegradation is demonstrated.

The Draft Final Decision Document also states in the Conclusion section “*The Wastewater Treatment Plant remains operational generating sludge placed inside of Site 9's Old Settling Ponds under the permit regulation of NDEP's Water Pollution Control Branch. All operation and maintenance will meet their requirements (ORNL 94(I)).*”

As stated in NDEP's letter dated January 20, 1999 for Site 9, the settling ponds are to be handled as a current wastewater treatment plant issue and were to be closed pursuant to requirements established by the Bureau of Water Pollution Control. NDEP's letters dated August 21, 1997 and March 5, 1996 were referenced. Accordingly, the settling ponds cannot be closed under the Installation Restoration Program. Also, the settling ponds were to be closed once the new facility came online during October 1995, and a report on the abandonment of the settling ponds and other components of the old plant were to be submitted within two weeks after closure (see NDEP's October 2, 1995 letter). The report was to address compliance with NDEP guidelines including sludge characterization and disposal. The Bureau of Water Pollution Control has not received this report (see NDEP's January 20, 1999 letter). The NDEP requested in the January 20, 1999 letter that the basis for not providing this report be presented in the Decision Document. These issues need to be addressed in the Decision Document. The Bureau of Federal Facilities at NDEP cannot concur with “No Further Action” for Site 9 under the Installation Restoration Program until this report is approved by the Bureau of Water Pollution Control and copied to the Bureau of Federal Facilities. Also, NAS Fallon needs to update the administrative record and provide documentation to explain why the settling ponds are still being used.

11. Page 8, Section IV, Proposed Action: The Draft Final Decision Document states “*The ground water at Group III is not contaminated. No risk assessment was necessary....The site is not considered a potential human health or ecological risk. (ORNL 94(I)).*”

The Draft Final Decision Document was prepared for Site 9, not Group III. The above statement needs to be changed accordingly.

The groundwater investigation at Site 9 is not considered adequate. See comment 7. The length of the ponds at the wastewater treatment plant is approximately 1200 feet. However, only one well (MW31) was installed to investigate contamination from the ponds. The well is located approximately 250 feet downgradient of the ponds and was sampled once. The number of groundwater samples collected is insufficient to make a determination regarding groundwater contamination, especially when considering that NAS Fallon assumed that contamination existed at the settling ponds (See comment 6A). Therefore, the NDEP cannot concur with the above statement.

The NDEP previously concurred with “No Further Action” for Site 9 as stated in the following correspondence:

- C NDEP's letter dated May 17, 1994 states “*The Division concurs with the recommendation of no further investigative or remedial actions **at this time.***”

C NDEP's letter dated August 21, 1997 states "*No Further Actions are required at the site under the IRP program*".

The NDEP will not rescind its original decision on Site 9. However, due to a lack of data available on the nature and extent of contamination for this site, post closure monitoring will be required if no additional investigative work is completed. NAS Fallon must propose a post-closure monitoring plan as requested in NDEP's letter dated January 20, 1999. See comment 12.

12. Page 8, Section V, Future Activity at Site 9: NAS Fallon has asserted that administrative controls will be imposed on Site 9. Please be advised that administrative controls are subject to future audit.

The extent of groundwater contamination at the Site 9 locations where soil contamination was detected or assumed does not appear to have been adequately investigated. See comments 3, 6, and 7. NRS 445A.465(d) states "*it is unlawful for any person to allow a pollutant discharge from a point source... to remain in a place where the pollutant or fluids could be carried into the waters of the state by any means.*" Site 9 does not appear to be in compliance with NRS 445A.465(d). Therefore, additional characterization work or post-closure monitoring may be warranted. Closure of Site 9 must be based on demonstrating a lack of contaminant migration based on analytical results for samples collected during several sampling events, and must be consistent with NAC 445A.22745. Groundwater sampling needs to address changes in groundwater quality that occur during the course of the year as hydrogeological conditions change, and a sufficient number of groundwater samples need to be collected to justify closure.

The NDEP will consider "No Further Action" for Site 9 when NAS Fallon submits a Post-Closure Monitoring Plan to the NDEP for review and approval to demonstrate that contaminants are not migrating from Site 9. The Plan needs to include the installation of additional monitoring wells, located adjacent to the contaminated areas. Preferential groundwater flow in fluvial channels needs to be considered when selecting well locations. The Plan also needs to address contingency plans for site remediation if significant groundwater contamination is detected during monitoring. Post-closure monitoring requirements can be reduced or eliminated if additional characterization work is completed which further defines the nature and extent of soil and groundwater contamination associated with Site 9.

TPH concentrations in soil at Site 9 have exceeded the State action level of 100 mg/kg. Therefore, the NDEP cannot approve site closure until the site is remediated or an A through K analysis is submitted to the NDEP for review in accordance with NAC 459.9973. The NDEP previously discussed this issue in a letter dated March 5, 1996 which presented comments on the draft Decision Documents dated November 1995. If the NDEP does not concur with the A-K analysis, then NAS Fallon has the option of pursuing site closure in accordance with NAC 459.9973(2). This regulation states the site can be assessed, based on the risk it poses to public health and the environment, to determine the necessary corrective action, or to establish that corrective action is not necessary. Such an evaluation must be conducted using ASTM Method E1739-95, or an equivalent method approved by the Division. Supporting

documentation, including assumptions and calculations, must be provided to the NDEP for review. The Division shall determine whether an assessment complies with the requirements of ASTM Method E1739-95, and may reject, require revisions, or withdraw its concurrence with the assessment at any time after the completion of the assessment.

13. Page 9, Recommendations: The Draft Final Decision Document states “*This decision document represents the selection of a no action alternative and subsequent closure for Site 9 at NAS Fallon, Fallon, Nevada. The no action alternative was developed in accordance with CERCLA as amended and is consistent with the NCP. This decision is supported by the documents in the administrative record for the site.*”

The NDEP does not concur with the recommendations for the reasons discussed in this letter.

14. Appendix C: The Draft Final Decision Document states on page C-6: “*Backup documentation for boring logs, analytical reports, calculations supporting groundwater velocities and sampling and analysis plan are in the referenced RI Report.*”

The NDEP does not concur with this statement. As discussed in the NDEP’s letter dated January 20, 1999, information or data that are used to support the “No Further Action” recommendation must be backed up with supporting documentation. Documentation does not need to be provided with the Decision Document, but needs to be present in NDEP’s files. Supporting documentation for Site 9 that do not appear to exist in the NDEP files are listed below.

- C Logs for the eight borings
- C Laboratory analytical reports
- C Sampling and Analysis Plan for the RI/FS (Volume III of the RI/FS Work Plan)

NAS Fallon must either provide the supporting documentation, or state the supporting documentation does not exist and is not included in the Administrative Record.

15. The RI/FS Work Plan dated August 1989 (page 1-77) states the following data would be collected in addition to samples collected from borings and wells:

- C Periodic surface water samples both upstream and downstream of the facilities to determine water quality of nearby drainage canals.
- C Sediment samples to check for contaminant accumulation along the bottom of the canal.
- C Water level and flow rate measurements at several locations in the drainage canals for use in contaminant migration modeling.

The RI Report states on page 9-7 that surface water and sediment samples were not collected. The justification for not collecting these samples needs to be presented in the Decision Document. Results of the water level and flow rate measurements, and conclusions, need to be summarized in the Decision Document.

16. NAS Fallon needs to address the comments in NDEP's January 20, 1999 letter for Site 9. Comments which need to be addressed, but were not discussed above, include the following:

Item 3 in NDEP's January 20, 1999 letter

NDEP requested that metal concentrations in soil and groundwater at Site 9 be compared with background metal concentrations, and that a drawing which shows where the background samples were collected be provided. The Draft Final Decision Document responds by stating on page C-5 "*Comparison of metal concentrations to background metal concentrations will not be provided since metals are not the contaminants of concern at the site.*" This statement is not considered to be an acceptable response. Metals were determined to be potential contaminants at Site 9 and the Decision Document needs to explain why metals are no longer considered contaminants of concern for both soil and groundwater. The PA/SI Report recommended on page 3-7 that priority pollutant metals be analyzed in samples collected from Site 9. The RI Report states on page 9-3 and the Draft Final Decision Document states on page 5 "*Suspected hazardous materials include metals, oils, paint wastes and photographic chemical (including silver, gold, and mercury) that may have been discharged to the sanitary sewer.*" During the RI/FS, 16 soil samples from the Group III sites were analyzed for metals. The Decision Document needs to explain why metals are not contaminants of concern by comparing metal concentrations to the ARARs and/or background concentrations.